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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANTHONY JAMES CROSS,

Defendant.

Case No. CR-23-101-BLG-SPW

**DEFENDANT'S UNOPPOSED
MOTION TO CONTINUE
TRIAL**

COMES NOW Defendant, ANTHONY JAMES CROSS, by and through his counsel of record, the FEDERAL DEFENDERS OF MONTANA and GILLIAN E. GOSCH, Assistant Federal Defender, and moves the Court for an order continuing the trial currently scheduled for November 27, 2023, and for an order extending the pretrial deadlines accordingly.

The grounds for this motion are as follows:

1. Additional time is needed to investigate the circumstances of the alleged offense in order to prepare for any change of plea or trial.
2. For these reasons, Defendant requests the Court to continue the trial of this matter. Such a continuance will allow for an adequate opportunity to explore relevant issues and prepare this case for trial. Further it will prejudice the Defendant if this continuance is not granted. Counsel for Defendant asserts that the ends of justice served by granting of such continuance outweigh the best interest of the public and the Defendant in a speedy trial. Defendant further asserts that for purposes of the speedy trial act, the number of days which this matter is continued are excludible under 18 U.S.C. §3161(h)(A)(B)(iv).
3. Defendant is currently in custody at the Big Horn County Jail in Basin, Wyoming.
4. Defense Counsel has contacted Zeno B. Baucus of the United States Attorney's Office regarding this continuance, and he has no objection to this Motion.

RESPECTFULLY SUBMITTED this 6th day of November, 2023.

/s/ Gillian E. Gosch

GILLIAN E. GOSCH
Federal Defenders of Montana
Counsel for Defendant

**CERTIFICATE OF SERVICE
L.R. 5.2(b)**

I hereby certify that on November 6, 2023, a copy of the foregoing document was served on the following persons by the following means:

1, 2 CM-ECF
 Hand Delivery
3 Mail
 Overnight Delivery Service
 Fax
 E-Mail

1. CLERK, UNITED STATES DISTRICT COURT
2. ZENO B. BAUCUS
Assistant United States Attorney
United States Attorney's Office
2601 2nd Avenue North
Billings, MT 59101
Counsel for the United States
3. ANTHONY JAMES CROSS
Defendant

/s/ Gillian E. Gosch
GILLIAN E. GOSCH
Federal Defenders of Montana
Counsel for Defendant